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February 18, 2016

Hon. Robert B. Kugler  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Court Room:  
Camden, NJ 08101

**Re: *Hadley et al v. Subaru of America, Inc. et al.*, Case No. 15-CV-7210**

Dear Judge Kugler

This firm represents Plaintiffs in the above-referenced putative class action. Defendants recently announced a recall directly pertinent to this litigation. In light of the issuance of the recall, Plaintiffs respectfully request that the Court set a March 11, 2016 deadline for the filing of the Second Amended Complaint. Defendants consent to this request. Additionally, the parties request that the Court vacate the February 22, 2016 deadline for Defendants to file a motion to dismiss, or otherwise respond to the operative complaint. A proposed consent order is enclosed.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

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Enclosure (1)